

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO**

IN RE:	:
	: CASE NO. 23-60242
Ray Gushard &	:
Rona J. Gushard,	: CHAPTER 13 PROCEEDING
	:
Debtors.	: JUDGE JOHN P. GUSTAFSON
	:

MOTION TO MODIFY CHAPTER 13 PLAN

Now come Debtors Ray Gushard and Rona J. Gushard, by and through the undersigned counsel, and moves this Court for an Order modifying the Chapter 13 Plan to require a payment of \$0.00 for the months of October 2023 and November 2023. The debtors have experienced a change in circumstance due to the unemployment of Debtor Ray Gushard. Mr. Gushard was laid off from Edge Plastics expecting to be recalled but has not yet been recalled. Debtor is actively seeking other employment.

Debtor represents that the plan remains feasible without payments for these two months and the modification is proposed in good faith. Debtor will resume payroll deduction beginning in December 2023.

Respectfully submitted,

/s/Jonathon C. Elgin
Jonathon C. Elgin (OH 0096390)
JC Elgin Co., LPA
6 Water St.
Shelby, OH 44875
567-275-1040
JC@JCElgin.com

CERTIFICATE OF SERVICE

I certify that on October 4, 2023, a true and correct copy of the Motion to Modify Chapter 13 Plan, was served via the Court's Electronic Case Filing System upon these entities and individuals who are listed on the Court's Electronic Mail Notice List:

- Office of the United States Trustee at [RegisteredEmailAddress]@usdoj.gov
- Dynele L. Schinker-Kuharich, Standing Ch. 13 Trustee at DLSK@Chapter13Canton.com via the court's Electronic Case Filing System
- Joshua Ryan Vaughan on behalf of Creditor Ohio Department of Taxation jvaughan@amer-collect.com, SAllman@AMER-COLLECT.COM;HouliECF@aol.com
- Richard John LaCivita on behalf of Creditor Home Point Financial Corporation bknotice@reimerlaw.com, rlacivita@ecf.courtdrive.com

and by regular U.S. Mail, postage prepaid, upon:

Ray Gushard
969 Neil Circle Ave.
Mansfield, OH 44903

Rona J. Gushard
969 Neil Circle Ave.
Mansfield, OH 44903

ECF CREDITOR MATRIX ATTACHED

/s/Jonathon C. Elgin
Jonathon C. Elgin (0096390)
Attorney for Debtors

Label Matrix for local noticing
0647-6
Case 23-60242-jpg
Northern District of Ohio
Canton
Wed Oct 4 16:41:50 EDT 2023

United States Bankruptcy Court
Ralph Regula U.S. Courthouse
401 McKinley Avenue SW
Canton, OH 44702-1745

Capital One
Attn: Bankruptcy
Po Box 30285
Salt Lake City, UT 84130-0285

Comenity Bank/Maurices
Attn: Bankruptcy
Po Box 182125
Columbus, OH 43218-2125

Comenitybank/Onetop
Attn: Bankruptcy
Po Box 182125
Columbus, OH 43218-2125

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600 Vine St., Suite 2500
Cincinnati, OH 45202-2491

Homepoint
PO Box 1000077
Duluth, GA 30096

LVNV Funding, LLC
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

Mitchell D Blum & Asc, LLC
1313 N Travis St, Suite 103
Sherman, TX 75092-5165

PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

Canton
Canton
Frank T Bow Federal Building
201 Cleveland Avenue SW
Canton, OH 44702-1912

CF Medical, LLC
c/o CT Corp System
4400 Easton Commons Waye STE 125
Columbus, OH 43219-6223

Capital One N.A.
by American InfoSource as agent
PO Box 71083
Charlotte, NC 28272-1083

Comenity Bank/Roaman's
Attn: Bankruptcy
Po Box 182125
Columbus, OH 43218-2125

Country Door/Swiss Colony
Attn:Bankruptcy
1112 Seventh Ave
Monroe, WI 53566-1364

Debt Recovery Solutions of Ohio
PO Box 1307
Mansfield, OH 44901-1307

Kidney Associates, Inc.
661 S Trimble Rd
Mansfield, OH 44906-3437

(p)MEADE & ASSOCIATES INC
ATTN BANKRUPTCY DEPARTMENT
737 ENTERPRISE DRIVE
LEWIS CENTER OH 43035-9438

Ohio Department of Taxation
Bankruptcy Division
P.O. Box 530
Columbus, Ohio 43216-0530

Quantum3 Group LLC as agent for
CF Medical LLC
PO Box 788
Kirkland, WA 98083-0788

Ohio Department of Taxation
Attn: Bankruptcy Division
PO Box 530
Columbus, OH 43216-0530

CMC
Foster Plaza Bldg 7
661 Andersen Dr.
Pittsburgh, PA 15220-2700

Comenity Bank/Catherines
Attn: Bankruptcy
Po Box 182125
Columbus, OH 43218-2125

Comenity Bank/Torrid
Attn: Bankruptcy
Po Box 182125
Columbus, OH 43218-2125

DRS
Attn: Bankruptcy
157 S Main St
Mansfield, OH 44902-7955

Home Point Financial Corporation
ServiceMac, LLC
9726 Old Bailes Road, Suite 200
Fort Mill, SC 29707-7882

Kohls/Capital One
Attn: Credit Administrator
Po Box 3043
Milwaukee, WI 53201-3043

Mid-State Physicians, LLP
335 Glessner Ave
Mansfield, OH 44903-2269

Ohio Health Physician's Group
335 Glessner Ave.
Mansfield, OH 44903-2269

Quantum3 Group LLC as agent for
Comenity Bank
PO Box 788
Kirkland, WA 98083-0788

X Richland Co. Clerk of Court 50 Park Ave E Mansfield, OH 44902-1888	Santander Consumer USA Attn: Bankruptcy Po Box 961245 Fort Worth, TX 76161-0244	Santander Consumer USA Inc. P.O. Box 560284 Dallas, TX 75356-0284
State of Ohio 30 E Broad St. Columbus, OH 43215-3414	Synchrony Bank/QVC Attn: Bankruptcy Po Box 965060 Orlando, FL 32896-5060	Synchrony Bank/Sams Attn: Bankruptcy Po Box 965060 Orlando, FL 32896-5060
The Huntington National Bank PO Box 89424 Cleveland, OH 44101-6424	Zoll Services, LLC 121 Gamma Dr Pittsburgh, PA 15238-2919	X Dynele L Schirker-Kuharich Office of the Chapter 13 Trustee 200 Market Avenue North, Ste. LL30 Canton, OH 44702-1434
X Jonathon Carl Elgin JC Elgin Co., LPA 6 Water St. Shelby, OH 44875-1223	X Ray Gushard 969 Neil Cir N Mansfield, OH 44903-7699	X Rona J. Gushard 969 Neil Cir N Mansfield, OH 44903-7699

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Meade & Associates, Inc.
737 Enterprise Dr.
Lewis Center, OH 43035-9436

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Home Point Financial Corporation	End of Label Matrix	
	Mailable recipients	41
	Bypassed recipients	1
	Total	42